

Subject: DMV requirements for EVs?

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Date: Wed, Feb 2, 2011 at 9:11 AM

Cc: JAMES Art <Art.JAMES@odot.state.or.us>, MCCLELLAN Thomas L <Thomas.L.MCCLELLAN@odot.state.or.us>

Mr. Christian,

I've been asked to respond to your inquiry on Oregon DMV requirements for electric vehicles. I apologize for the lengthy nature of this response, but there are two topics to which your inquiry may be referring: title and registration requirements; and Oregon safety requirements. I will address both.

Four-wheeled electric vehicles may be eligible for three different types of vehicle registration: low-speed, medium-speed, or passenger, depending on the vehicle's maximum speed and intended use. Two- and three-wheeled electric vehicles may be eligible for either moped or motorcycle registration. Title and registration requirements are similar for all types of registration, but the different vehicle categories are subject to different safety standard requirements and fees. Here are the safety requirements for four-wheeled vehicles.

Low-speed vehicle is defined as a four-wheeled motor vehicle with a maximum speed of more than 20 miles per hour but not more than 25 miles per hour. In order to be registered, they are subject to the Federal Motor Vehicle Safety Standard No. 500 (<http://www.fmcsa.dot.gov/rules-regulations/administration/fmcsr/fmcsrruletext.aspx?chunkKey=090163348008f2cb>).

The specific certification that DMV requires for a low-speed vehicle is a Manufacturer's Certificate of Origin (MCO) that specifies the vehicle was manufactured to meet Federal Low-Speed vehicle standards or a Federal Standards sticker that indicates the vehicle meets this standard . If the vehicle has neither, the owner must complete DMV Form 7212, Low-Speed Vehicle Certification.

Medium-speed electric vehicle is defined as an electric motor vehicle with four wheels that is equipped with a roll cage or crushproof body design that can attain a maximum speed of 35 miles per hour on a paved, level surface, is fully enclosed and has at least one door for entry. These vehicles are subject to the Oregon safety standards for medium-speed electric vehicles under <http://www.oregon.gov/ODOT/CS/RULES/docs/20101123/737-010-0020prptext.pdf> . The rule addresses the required equipment and standards to which a medium-speed electric vehicle must conform. The specific certification that is required for a medium-speed electric vehicle is DMV Form 7213, Medium-Speed Electric Vehicle Certification. There are no federal standards since the National Highway Traffic Safety Administration does not recognize this vehicle type.

Electric vehicles may also be eligible for passenger vehicle registration, which does not have a speed limit defined. Electric vehicles titled as passenger vehicles would need to meet Federal safety standards as set forth in Chapter 49, Part 571 of the Federal Motor Vehicle Safety Standards. An electric vehicle titled as a passenger vehicle is required to meet the same standards as any other passenger vehicle in order to be titled and registered; the difference in registration is reflected in the motive power that is captured at the time of registration, which would be "E" for electric.

There is no specific certification required for passenger vehicle registration. A vehicle must meet federal standards, but a customer is not required to provide proof of compliance with federal standards when the vehicle has previously been titled or registered in the U.S.; or when the MCO is issued by an authorized U.S. distributor. All low-speed, medium-speed or passenger electric vehicles with a model year of 2009 or newer must also contain a label or certification that the vehicle meets Low Emission Vehicle (LEV) requirements, per the Oregon Department of Environmental Quality. This certification is usually on the MCO or on the vehicle's window or under the hood.

You can find more information on vehicle title and registration requirements on our website at: <http://www.oregon.gov/ODOT/DMV/vehicle/titlereg.shtml>

Thank you for your inquiry. Please let myself or a member of my staff know if you have any additional questions. We can be reached by e-mail or at the telephone number provided below.

*Lori Bowman
Oregon DMV
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*(Special Thanks to
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